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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
SANTA ANA

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11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
13 SOUTHERN DIVISION

14 EDCO PLASTICS, INC., a California
15 Corporation,

16 Plaintiff,

17 vs.

18 EPROMOLOGO, a Florida
19 Corporation; INNOVATIVE
MARKETING SOLUTIONS, LLC
20 d/b/a EPROMO PRODUCTS, a Florida
21 Limited Liability Company; and DOES
22 1-10, inclusive,

23 Defendants.

Case No.: SACV 12 - 01316 DOC (RNBx)

**COMPLAINT FOR DAMAGES AND
INJUNCTION FOR:**

**INFRINGEMENT OF UNITED
STATES PATENT NO. 6,962,013**

REQUEST FOR JURY TRIAL

1 Plaintiff Edco Plastics, Inc. (“Edco” or “Plaintiff”), through its attorneys,
2 Sheldon Mak & Anderson PC, alleges:

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4 THE PARTIES

5 1. At all times relevant, Plaintiff Edco Plastics, Inc. was, and is, a
6 corporation duly organized under the laws of the State of California and having its
7 principal place of business in the County of Orange, California.

8 2. Edco is informed and believes and thereon alleges that at all times
9 mentioned herein defendant ePromoLogo was, and is, a Florida corporation with
10 its principal place of business in the County of Orange, Florida.

11 3. Edco is informed and believes and thereon alleges that at all times
12 mentioned herein defendant Innovative Marketing Solutions, LLC d/b/a ePromo
13 Products (“ePromo Products”) was, and is, a Florida Limited Liability Company
14 with its principal place of business in the County of Orange, Florida.

15 4. The true names and capacities of the Defendants named herein as
16 DOES 1 through 10, whether individual, corporate, associate, or otherwise, are
17 unknown to Plaintiff, who therefore sues said Defendants by said fictitious names.
18 Plaintiff is informed and believes, and thereon alleges, that each of the Defendants
19 designated herein as DOE is legally responsible for the events and happenings
20 hereinafter alleged and legally caused injury and damages proximately thereby to
21 Plaintiff as alleged herein. Plaintiff will seek leave to amend the Complaint when
22 the true names and capacities of said DOE Defendants have been ascertained.
23 ePromoLogo, ePromo Products, and DOES 1 through 10 are hereinafter
24 collectively referred to as “Defendants.”

25 5. Plaintiff is informed and believes, and on that basis alleges, that each
26 of the Defendants participated in and is in some manner responsible for the acts
27 described in this Complaint and any damages resulting therefrom.

1 6. Plaintiff is informed and believes, and on that basis alleges, that
2 Defendants and DOES 1 - 3 have acted in concert and participation with each other
3 concerning the claims in this Complaint.

4 7. Plaintiff is informed and believes, and on that basis alleges, that each
5 of DOES 4 – 10 is a customer of Defendants.

6 8. Plaintiff is informed and believes, and on that basis alleges, that
7 Defendants and DOES 1-3 was empowered to act as the agent, servant and/or
8 employees of each other, and that all the acts alleged to have been done by each of
9 them were authorized, approved and/or ratified by each of them.

10 **JURISDICTION AND VENUE**

11 9. Plaintiff Edco asserts against Defendants a claim for patent
12 infringement arising under the patent laws of the United States, Title 35 of the
13 United States Code. This Court, therefore, has subject matter jurisdiction under 28
14 U.S.C., §§ 1331 and 1338(a).

15 10. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(c)
16 and 1400(a)-(b) because all Defendants may be found within this judicial district,
17 and because a substantial part of the events giving rise to this claim, as to each
18 Defendant, occurred within this judicial district.

19 **THE PATENT AT ISSUE**

20 11. Plaintiff is the owner of all right, title and interest in and to United
21 States Patent No. 6,962,013 (the “‘013 Patent”), entitled “License Plate Frame,”
22 that was duly and legally issued on November 8, 2005. A true and correct copy of
23 the ‘013 Patent is attached hereto as Exhibit A.

24 12. The method claimed in the ‘013 patent is a method of forming a
25 vehicle license plate frame. Claim 1 lists the steps of the method which includes
26 forming a frame body having a first color, wherein the frame body comprises a
27 substantially planar surfaces and at least one character formed by a recessed

1 surface in the frame body, and adhering a contrast layer comprising an adhesive
2 substance and a coloring agent having a second color to the substantially planar
3 surface of the frame body and not to the recessed surface, wherein the second color
4 contrasts with the first color.

5 13. Claim 4 claims a method of forming a vehicle license plate frame by
6 forming a frame body having a first color, wherein the frame body comprises a
7 substantially planar surface and at least one character formed by a recessed surface
8 in the frame body. The steps include adhering a contrast layer comprising an
9 adhesive substance and a coloring agent having a second color to the
10 substantially planar surface of the frame body and not to the recessed surface,
11 wherein the second color contrasts with the first color, by: providing a hot stamp
12 foil having a transfer surface and a working surface, the transfer surface compris-
13 ing a layer of colored material; placing the transfer surface of the hot stamp foil
14 onto the substantially planar surface; and applying heat and pressure to the
15 working surface of the hot stamp foil, thereby forming the layer of colored
16 material on the substantially planar surface of the frame body.

17 14. Claim 6 claims a method of forming a vehicle license plate frame,
18 comprising the steps of: (a) forming a frame body having a first color, wherein the
19 frame body comprises: a substantially planar surface; and a character formed in a
20 recessed surface in the frame body, and wherein the character comprises an upper
21 surface; and (b) adhering a contrast layer comprising an adhesive substance and a
22 coloring agent having a second color to the substantially planar surface of the
23 frame body and to the upper surface of the character but not to the recessed
24 surface, wherein the second color contrasts with the first color.

25 15. Claim 8 claims a method of forming a vehicle license plate frame,
26 comprising the steps of: forming a frame body having a first color, wherein the
27 frame body comprises: (i) a substantially planar surface; and a character formed in

1 a recessed surface in the frame body, wherein the character comprises an upper
2 surface; and adhering a contrast layer comprising an adhesive substance and a
3 coloring agent having a second color to the substantially planar surface of the
4 frame body and to the upper surface of the character but not to the recessed
5 surface, wherein the second color contrasts with the first color, by: providing a
6 hot stamp foil having a transfer surface and a working surface, the transfer
7 surface comprising a layer of colored material; (ii) placing the transfer surface
8 of the hot stamp foil onto the substantially planar surface; and (iii) applying heat
9 and pressure to the working surface of the hot stamp foil, thereby forming the layer
10 of colored material on the substantially planar surface of the frame body.

11 **CLAIM FOR RELIEF**

12 **(Against All Defendants for Patent Infringement, 35 U.S.C. § 271)**

13 16. Edco restates and incorporates by reference the allegations of
14 paragraphs 1-15 as if set forth fully herein.

15 17. Upon information and belief, Defendants and Does 1-3 have used
16 and/or have, without authorization, used, offered for sale and sold license plates
17 that were made using the method of the '013 patent that infringes the '013 patent,
18 both literally and/or under the doctrine of equivalents.

19 18. Upon information and belief, one or more of Defendants are aware of
20 the '013 patent and continues to sell or offer to sell products that infringe the '013
21 patent through and on, but not limited to, the websites epromologo.com,
22 epromoproducts.com, and licenseplatesandframes.com.

23 19. Upon information and belief, Defendants have provided its customers,
24 Does 4-10, with license plates that were made using the method of the '013 patent.
25 These customers are, therefore, direct infringers of the '013 patent.

1 20. As a result of the aforementioned acts, Defendants have infringed,
2 actively induced infringement and/or contributed to infringement by others of
3 claims 1-8 of the '013 patent.

4 21. Plaintiff informed at least one of the Defendants of the '013 patent on
5 or about May 17, 2012. On information and belief, Defendants have nevertheless
6 continued infringement, inducement of infringement and contributory infringement
7 of the '013 patent without seeking the permission or authorization of Plaintiff.

8 22. Upon information and belief, by the acts of patent infringement herein
9 complained of, Defendants have made substantial profits to which they are not
10 equitably entitled.

11 23. Plaintiff is entitled to recover from Defendants all damages it has
12 sustained as a result of Defendants' infringement, inducement of infringement and
13 contributory infringement of the '013 patent.

14 24. Upon information and belief, Defendants' infringement, induced
15 infringement and/or contributory infringement of the '013 patent will continue and
16 will cause Plaintiff irreparable harm unless enjoined by this Court. Plaintiff has no
17 adequate remedy at law.

18 25. Upon information and belief, this is an exceptional case as to
19 Defendants under 35 U.S.C. § 285.

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PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests judgment as to Defendants as follows:

A. Preliminary and permanent injunctions against further infringement, inducement of infringement or contributory infringement of the '013 patent by Defendants;

B. An award in favor of Plaintiff of three times the damages it has sustained as a consequence of Defendants' infringement, inducement of infringement and contributory infringement of the Patent pursuant to 35 U.S.C. § 284;

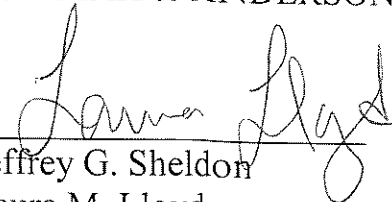
C. An award to Plaintiff of its attorneys' fees, as provided by 35 U.S.C. § 285 as to Defendants;

D. An award to Plaintiff of interest and costs as fixed by the Court as to Defendants; and

E. An award to Plaintiff of such other and further relief as this Court deems just and proper.

Dated: August 14, 2011

Respectfully submitted,
SHELDON MAK & ANDERSON PC

By: 
Jeffrey G. Sheldon
Laura M. Lloyd
William D. Bowen

Attorneys for Plaintiff Edco Plastics, Inc.

REQUEST FOR JURY TRIAL

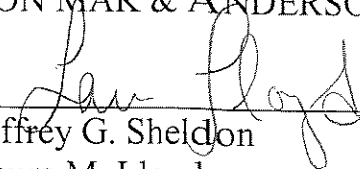
Edco requests a trial by jury of all issues that are properly tried to a jury.

Dated: August 14, 2011

Respectfully submitted,

SHELDON MAK & ANDERSON PC

By: _____


Jeffrey G. Sheldon

Laura M. Lloyd

William D. Bowen

Attorneys for Plaintiff Edco Plastics, Inc.

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(12) **United States Patent**
Perrin

(10) Patent No.: **US 6,962,013 B1**
(45) Date of Patent: **Nov. 8, 2005**

- (54) LICENSE PLATE FRAME
- (75) Inventor: **Patrick Perrin**, Rancho Palos Verdes, CA (US)
- (73) Assignee: **Perrin Manufacturing Company**, City of Industry, CA (US)
- (*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 0 days.
- (21) Appl. No.: **10/857,064**
- (22) Filed: **May 28, 2004**
- (51) Int. Cl.⁷ **G09F 7/00**
- (52) U.S. Cl. **40/209; D12/193**
- (58) Field of Search **40/209; 428/346; D12/193**

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Primary Examiner—Gary C. Hoge
(74) Attorney, Agent, or Firm—Michael Fedrick; Jeffrey G. Sheldon; Sheldon & Mak

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(57) **ABSTRACT**

License plate frames having recessed areas in the frame surface which form characters, words, and/or graphics, and having an adhered layer of material of contrasting color on the frame surface.

8 Claims, 2 Drawing Sheets

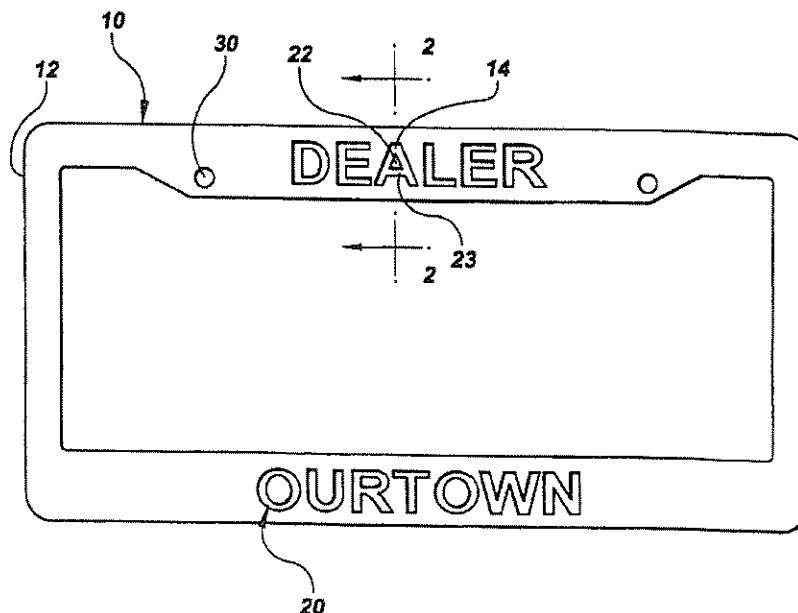


FIG. 1

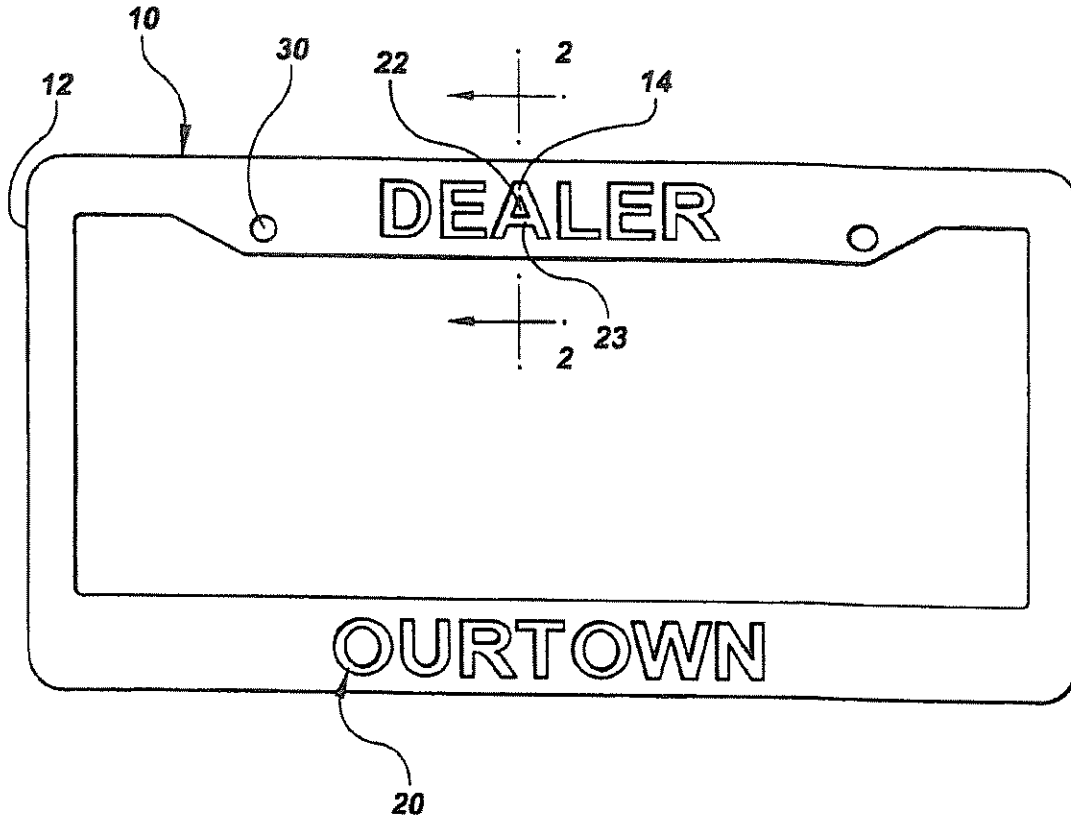


FIG. 2

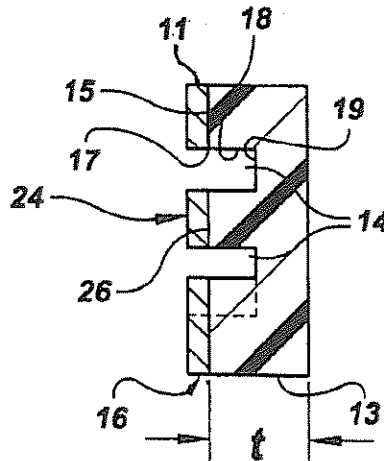


FIG.3

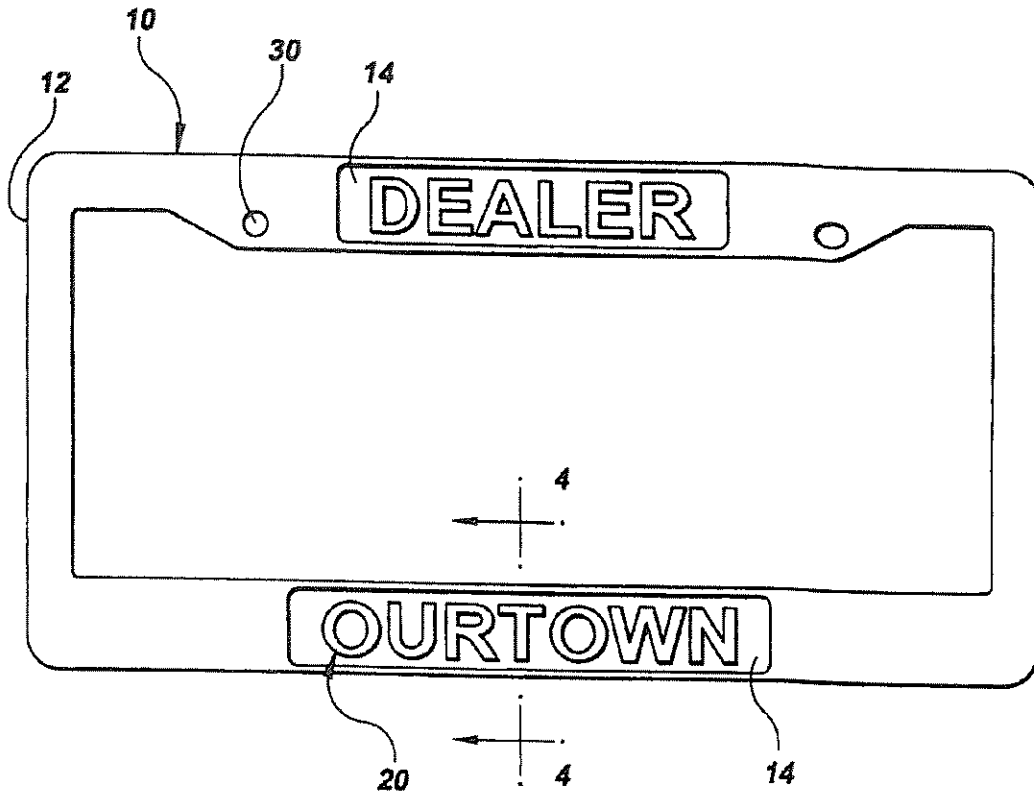
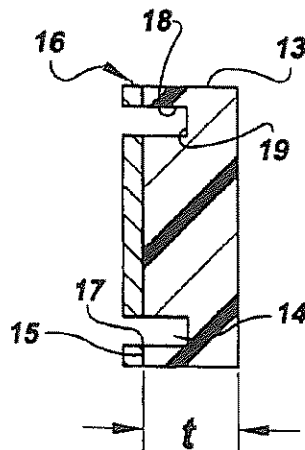


FIG.4



US 6,962,013 B1

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LICENSE PLATE FRAME

BACKGROUND

Decorative license plate frames, in particular those for automobile license plates, frequently include words or decorative symbols on their surfaces. For example, automobile dealerships often include their names on license plate frames as a form of advertisement. One method of forming words or symbols on a frame surface is to screen print them on a flat surface of a molded frame. Words can also be bonded or otherwise attached to a surface of a frame. A further method of forming words on a license plate frame is to integrally mold them on the surface of a plastic frame. Letters formed in this way are raised above a flat surface of the frame, and a layer of contrasting colored material is applied to the letters' raised surface.

These methods of forming characters in a license plate frame, however, suffer from several drawbacks. Screen printed lettering, for example, lacks the visual depth of a raised letter. Raised lettering, however, is subject both to fading due to sun exposure as well as to physical wear. Bonded lettering is subject to the strength and durability of the adhesive or other means used to attach the lettering to a frame, and such lettering may become detached from the frame over time.

SUMMARY

The license plate frames described herein overcome the drawbacks of prior license plate frames through the use of recessed areas in a frame surface and an adhered layer of material having a contrasting color. The present frames for a vehicle license plate include a substrate having a substantially planar surface, a contrast layer adhered to this surface which has a contrasting color compared with the color of the surface, and one or more recessed portions in the substrate. The frames are preferably made from a plastic material having a thickness of between about 120 and about 135 thousandths of an inch, and the recessed portions in the substrate are preferably about 50 thousandths of an inch deep. The recessed portions meet the surface of the substrate at a substantially non-radiused edge and form or highlight one or more characters in the frame. The recessed portions can form complete letters or other characters, or can in addition include a contrasting portion to form part of a character. Such a contrasting portion has an upper surface which is substantially coplanar with the substantially planar surface of the substrate, and the contrast layer is adhered to this surface. The contrasting portion can alternatively form a complete character, in which case the recessed portion provides a contrasting background for the character.

Such frames can be made by forming a frame body having a substantially planar surface and at least one character formed by a recessed surface in the frame body, and then adhering a contrast layer to the substantially planar surface of the frame body and not to the recessed surface. The frame body has a first color, and the contrast layer has a second color that contrasts with the first. Preferably, at least one recessed surface forms a complete letter or other character. The contrast layer can be adhered through the use of a hot stamp foil. A transfer surface of the hot stamp foil comprising a layer of colored material is placed onto the substantially planar surface of the frame body, after which heat and pressure are applied to a working surface (the other side) of the hot stamp foil, thereby forming the layer of colored material on the substantially planar surface of the frame

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body. The recessed surface and the substantially planar surface preferably meet at a substantially non-radiused edge in order to facilitate removal of the hot stamp foil from the surface of the frame.

In an alternative to this method, a character can be formed by a raised surface present in a recessed surface of the frame body. The raised surface is substantially coplanar with the substantially planar surface of the frame body, and the contrast layer is formed on this raised surface at the same time as on the substantially planar surface. The recessed surface in this embodiment can serve as a background to a character formed by the raised surface, or alternatively the raised surface can help to form a character outlined by the recessed surface.

DRAWINGS

These and other features, aspects and advantages of the present invention will become better understood with regard to the following description, appended claims, and accompanying figures where:

FIG. 1 is a plan view of a frame having recessed characters.

FIG. 2 is a sectional view of the frame of FIG. 1 along line 2-2.

FIG. 3 is a plan view of a frame having raised characters surrounded by recessed areas of the frame.

FIG. 4 is a sectional view of the frame of FIG. 3 along line 4-4.

All dimensions specified in this disclosure are by way of example only and are not intended to be limiting. Further, the proportions shown in these Figures are not necessarily to scale. As will be understood by those with skill in the art with reference to this disclosure, the actual dimensions of any device or part of a device disclosed in this disclosure will be determined by their intended use.

DETAILED DESCRIPTION

The vehicle license plate frames described herein provide an improved combination of surface features and character display features compared with prior frames. The present frames 10, for example, comprise characters 20 formed in recessed areas 14 of a frame body 12 which are not subject to as much wear or exposure to the elements compared with raised lettering on a frame. The frame body 12, for supporting or containing a vehicle license plate, comprises a substrate 13 having a substantially planar outer surface 15. Recessed portions 14 in the frame body 12 are molded, cut, or otherwise formed in the substrate 13. As used herein, "recessed portion" refers to an area of the frame body 12 having a surface which extends below the plane of the substantially planar surface 15 of the substrate 13, i.e. away from the substantially planar surface 15 in the direction of the rear surface of the frame 10.

The recessed portions 14 of the frame 10 and the substantially planar surface 15 of the substrate 13 meet and are joined at an edge 17 of the substantially planar surface 15. The wall or walls 18 defining the recessed portion 14 extend away from this edge 17, preferably at an angle of less than about 90 degrees from the substrate surface 15, such as an angle of about 85 degrees, though walls extending at a less steep angle are also practicable with an injection molded frame. In a preferred embodiment, a recessed portion 14 includes a base 19 comprising a surface in the recessed

US 6,962,013 B1

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portion 14 connected to the walls 18. The base 19 can preferably be planar and parallel to the substantially planar outer surface 15.

The material of the frame body 12, which is preferably monochromatic, has a first color. The recessed portions 14 formed in the frame body 12 thus have this first color. The frame body 12 further includes a layer of material 16 adhered to the substantially planar surface 15 which has a second color that contrasts with the first color of the frame body 12. The term "contrast" and variations thereof is used herein to refer to colors which can be distinguished by an average human observer with good vision (i.e., approximately 20/20 vision, with or without correction) in mid-day outdoor lighting conditions when placed side by side with each other. The term "colors" refers to any hue in the visible spectrum and includes black, white, and gray, as well as various finishes such as matte, glossy, and metallic. Contrast generally increases with increased difference in color wavelengths. For example, red color having a wavelength of 700 nanometers generally contrasts more with yellow having a wavelength of 580 nanometers than with orange having a wavelength of 620 nanometers. When the contrasting colors are black, white and/or gray, contrast can be measured as the difference in brightness between the lightest and darkest shades.

The edge 17 joining the recessed portions 14 and the substantially planar surface 15 of the substrate 13 is substantially non-radiused, i.e. is a sharp edge. When a contrast layer 16 is applied to the frame 10 from a transfer sheet comprising an ink or other coloring agent, such as a hot stamp foil, and the transfer sheet is subsequently removed from the surface 15 of the frame, the use of a substantially non-radiused edge results in a clean separation between the coloring agent adhered to the frame 10 and the coloring agent remaining on the transfer sheet. The resulting outer edge 111 of the contrast layer 16 is thereby given a generally smooth appearance. The edges 17, if they are slightly radiused (for example, due to manufacturing tolerances and variations), should have a radius which is less than the depth of the recessed portion 14, that is, the distance from the plane of the substantially planar surface 15 to the base 19 of the recessed portion 14. Preferably the radius is less than half of this depth, and more preferably less than a tenth of this depth.

The characters 20 of the frame can be formed by recessed portions 14 in the substrate 13 of the frame 10. As used herein, the term "character" refers to any number, letter, punctuation mark, picture or other symbol or graphic image that can be formed by a recess in the surface of the frame body 12 and the contrast layer 16. A character 20 can be formed completely by the recessed portion 14, or a further contrasting portion 24 that borders or falls within the recessed portion 14 can be used in addition to form a character 20, as described below.

In one embodiment, the frame 10 includes one or more discontinuous recessed portions 14, and the recessed portions 14 form either the entire character 20 or at least a portion of the character 20. For example, as shown in FIG. 1, a complete character 20 depicting the letter "L" (in the word DEALER) can be formed entirely from a recessed portion 14, i.e., the boundaries of the letter comprise the boundaries between the recessed portion 14 and the surface of the frame substrate 13.

For some characters 20, however, a contrasting portion 24 within the character 20 is needed in order to form the character 20. For example, in order to form the letter "A" as shown in FIG. 1, a small contrasting portion 24 within the

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recessed portion forming the letter is required, i.e. the roughly triangular segment 22, in order to form the recessed crossbar 23 of the letter. In order to form such a contrasting portion 24 within the recessed portion 14 of the character 20, the contrasting portion 24 includes a character upper surface 26 which is substantially coplanar with the surface 15 of the substrate 13. In this way, the same contrast layer 16 adhered to the substrate 13 can likewise be adhered to the character upper surface 26.

In an alternative embodiment, the contrasting portion 24 forms a complete character 20. For example, the characters 20 shown in FIG. 3 comprise a character upper surface 26 overlaid by a contrast layer 16 (as shown in FIG. 4). In this embodiment, the contrasting portion 24 which forms a character 20 can be entirely within a recessed portion 14 as shown in FIG. 3, or alternatively the character 20 can be joined to the substrate 13 by a joining portion (not illustrated). The recessed portion 14 in this embodiment thus forms a background which highlights the characters 20 formed by the contrasting portion 24.

Frames are designed to provide support to the license plates with which they are used and are generally attached to the license plates and/or to the vehicles for which the license plates are issued. For example, the frame 10 shown in FIG. 1 includes screw holes 30 for receiving screws (not shown). In order to mount the frame 10 and a license plate, the screws are placed through screw holes 30 and then through corresponding holes provided in the license plate. The frame 10 and license plate can then be placed together onto the surface of a vehicle having two corresponding holes for receiving the screws. The screws are then lined up with the holes in the vehicle and rotated in order to screw them into the vehicle holes.

Frames 10 can have two holes 30 as shown in FIGS. 1 and 3, or alternatively can be provided with further holes for engaging screws or other mounting means (or even with only one hole). Four-hole automobile license plates and frames are commonly used. Other ways of securing a frame 10 and license plate to a vehicle can also be employed, though it is preferred that the frame 10 and license plate be removably secured to a vehicle (as is the case when screws are used).

The rear surface (not shown) of the frame 10 is in contact with the front surface (i.e. the surface designed to be viewed) of a license plate when the frame 10 and license plate are secured to a vehicle. The rear surface can have attached thereto clips, hooks, or other means for further securing the license plate to the frame 10. Additionally or alternatively, a lip (not shown) extending away from the front surface of the frame 10 can be provided along the periphery of the frame 10 in order to help retain a license plate.

To form a frame 10 as described herein, a frame body 12 is formed from a suitable material, such as plastic, i.e. a synthetic or semisynthetic polymer material that can be molded or extruded into objects. Preferably, a plastic material such as high impact polystyrene or ABS is used, and the frame body 12 is injection molded. A minimum wall thickness on the frame 10 of 0.075 inch to 0.100 inch is preferably maintained to achieve optimum filling of the mold during the injection molding process and to minimize the tendency of the molded part to warp.

In this embodiment, the face of the frame body 12 carrying the characters 20 to be displayed preferably has a thickness ("t" in FIGS. 2 and 4) of between about 120 and 135 thousandths of an inch. While the use of a substrate 13 having a lesser thickness is possible, this range has been found to produce a desirable visual quality in the recessed

US 6,962,013 B1

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characters 20. Recessed portions 14 formed in frames 10 of this thickness are preferably about 50 thousandths of an inch deep, i.e. the base 19 of such a recessed portion 14 is about 50 thousandths of an inch from the plane of the substantially planar surface 15 of the substrate 13. Any characters 20 formed within such a recessed portion 14 thus preferably rise approximately 50 thousandths of an inch high from the base 19 of the recessed portion 14, so that the character upper surface 26 is substantially coplanar with the surface 15 of the frame substrate 13. The characters 20 of the frame 10 are preferably formed together with (e.g., integrally molded with) the rest of the frame body 12, though they could also be formed afterward by cutting into the frame body 12, such as by machine cutting.

In order to apply the contrast layer 16 to the substrate surface 15 and any character upper surfaces 26, a hot stamp foil is preferably brought into contact with these surfaces. As used herein, a "hot stamp foil" refers to a transfer sheet comprising an ink or other coloring agent in a hot melting type adhesive layer of the transfer sheet, as is known in the art. The use of multiple coloring agents can allow an image to be formed in the adhesive layer. The adhesive layer itself is formed on a transfer surface of the transfer sheet, with the opposite surface of the transfer sheet comprising a working surface capable of withstanding the heat and pressure required to transfer the adhesive layer to another surface, and capable of transferring sufficient heat through the transfer sheet for this purpose.

In order to form a contrast layer 16 on the surface 15 of a frame body 12, the transfer surface of the hot stamp foil is placed in contact with the substantially planar substrate surface 15, and the working surface of the hot stamp foil is contacted by a heated surface of approximately 400 degrees Fahrenheit which is also capable of applying pressure, such as a roller or a hydraulic press. Pressure of up to four tons is applied to the working surface for several seconds, after which the hot stamp foil is pulled away from the frame 10, leaving a layer of colored material 16 from the transfer surface of the hot stamp foil adhered to the frame 10. When the edges 17 between the recessed portions of the frame surface and the substantially planar portion of the frame surface are sharp edges, the edges of the contrast layer are clean, i.e. they conform to the edges 17 of the characters 20.

The contrast layer 16 formed by such colored material should have a color which contrasts with the color of the substrate 13, so that a character 20 formed in or by a recessed surface 14 in the substrate 13 can be distinguished by a viewer. In one embodiment, the substrate 13 is black, and the contrast layer has a metallic color, such as chrome, silver, or gold. Preferably, the hot stamp foil has a surface area sufficient to cover all of the substantially planar surface 15 of the frame body 12.

The hot stamp foil and the coloring agent used in the hot stamp foil can be any of a number of different foils and coloring agents known to the art. For example, mylar foil containing a silicone dye can be used. Preferably, a hot stamp foil which creates a metallic appearance on the surface of the frame, such as the brushed chrome foil made by ITW Foils (5 Malcolm Hout Drive, Newburyport, Mass. 01950), is used.

Although the use of a hot stamp foil to transfer a colored layer to a frame 10 is preferred, other methods of producing the contrast layer 16 on the frame surface 15 can be used. The contrast layer 16 should generally comprise an adhesive substance and a coloring agent. The adhesive substance is one capable of holding materials together by surface attachment. Laminating, the use of cold stamp foils, and other

6

methods for creating a colored surface can also be employed to produce the contrast layer 16.

EXAMPLE 1

Frame with characters Formed by Recessed Portions

A frame for an automobile license plate having characters formed by the recessed portions of the frame, such as the Edge FX frame (manufactured by Perrin Manufacturing Co., 1020 Bixby Drive, Industry, Calif. 91745-1703), was formed. The frame body was approximately 120 thousandths of an inch thick and was rectangular, having two shorter parallel sides approximately 6 inches in length and two longer parallel sides approximately 12 inches in length. Recessed letters similar to those shown in FIG. 1 were formed in the front surface of one of the longer sides in order to form the word PRINCETON, while the word RUGBY was formed in the other long side with such recessed letters. The front surface was about $\frac{1}{2}$ " wide along the shorter sides and between $\frac{3}{8}$ " of an inch and 1 inch wide along the longer sides, the width being such as to cover the edges of a license plate placed in the frame. Four holes for retaining screws were formed, two in each of the longer sides.

Adhered to the front surface of the frame was a layer of metallic colored material transferred by a hot stamp foil technique from a brushed chrome foil made by ITW Foils. The edges between the recessed areas of the frame surface and the substantially planar front surface were sharp, and the walls forming the recessed areas extended away from the front surface of the frame at approximately an 85 degree angle. These walls extended approximately 50 thousandths of an inch from the front surface of the frame before reaching a lower surface roughly parallel with the front surface of the frame. The frame substrate was black in color, so the layer of chrome-colored material contrasted with the black-colored recessed letters.

A lip was formed around the outer periphery of the frame body which extended toward the rear surface of the frame at approximately a 90 degree angle to the front surface of the frame. The lip extended approximately $\frac{3}{16}$ " of an inch from the front surface and was approximately $\frac{3}{8}$ " of an inch thick. Two retainer clips were formed in the lip along the longer side which comprised the word RUGBY in order to help retain a license plate.

EXAMPLE 2

Frame with Characters Formed Within a Recessed Portion

A frame having characters formed within the recessed portions of the frame, such as the Panel FX frame (manufactured by Perrin Manufacturing Co., 1020 Bixby Drive, Industry, Calif. 91745-1703), was formed. The frame was identical to the frame of Example 1, except that raised letters similar to those shown in FIG. 3 (rather than recessed letters) were formed in one of the longer sides of the frame in order to form the word "Panel Fx", while the words "Put Your Name Here" were formed in the other long side with such letters. The recessed portion of the front surface of the frame formed a black background which provided contrast to the chrome-colored letters.

EXAMPLE 3

Manufacturing a Frame

A frame body as described in Example 1 was injection 5
 molded from impact polystyrene with an overall nominal
 wall thickness of 0.135" and a minimum wall thickness in
 the lettering of 0.085" to facilitate the filling of the part and
 minimize warping. A roll of brushed chrome foil made by
 ITW Foils was unrolled so as to expose an unused portion 10
 of the foil, and the transfer surface (i.e., the surface con-
 taining the colored adhesive material) was placed into
 contact with the substantially planar front surface of the
 frame. A heated platen at 400 degrees Fahrenheit was
 pressed against the opposite surface of the hot stamp foil for 15
 2 seconds. The foil was then pulled away from the frame,
 leaving the front surface covered by a layer of chrome-
 colored adhesive material. The frame and adhesive layer
 were allowed to cool for 3 seconds in order to allow the
 adhesive layer to harden on the frame. 20

Although the present invention has been discussed in
 considerable detail with reference to certain preferred
 embodiments, other embodiments are possible. Therefore,
 the scope of the appended claims should not be limited to the
 description of preferred embodiments contained in this 25
 disclosure. All references cited herein are incorporated by
 reference to their entirety.

What is claimed is:

1. A method of forming a vehicle license plate frame,
 comprising the steps of:

- (a) forming a frame body having a first color, wherein the 30
 frame body comprises a substantially planar surface
 and at least one character formed by a recessed surface
 in the frame body; and
- (b) adhering a contrast layer comprising an adhesive 35
 substance and a coloring agent having a second color to
 the substantially planar surface of the frame body and
 not to the recessed surface, wherein the second color
 contrasts with the first color.

2. The method of claim 1, wherein at least one recessed 40
 surface forms a complete character.

3. The method of claim 1, wherein the recessed surface
 and the substantially planar surface meet at a substantially
 non-radiused edge.

4. A method of forming a vehicle license plate frame, 45
 comprising the steps of:

- (a) forming a frame body having a first color, wherein the
 frame body comprises a substantially planar surface
 and at least one character formed by a recessed surface
 in the frame body; and 50
- (b) adhering a contrast layer comprising an adhesive
 substance and a coloring agent having a second color to
 the substantially planar surface of the frame body and
 not to the recessed surface, wherein the second color
 contrasts with the first color, by:

- (i) providing a hot stamp foil having a transfer surface
 and a working surface, the transfer surface compris-
 ing a layer of colored material;
- (ii) placing the transfer surface of the hot stamp foil
 onto the substantially planar surface; and
- (iii) applying heat and pressure to the working surface
 of the hot stamp foil, thereby forming the layer of
 colored material on the substantially planar surface
 of the frame body.

5. The method of claim 4, wherein the hot stamp foil has
 a surface area sufficient to cover the substantially planar
 surface of the frame body.

6. A method of forming a vehicle license plate frame,
 comprising the steps of:

- (a) forming a frame body having a first color, wherein the
 frame body comprises:
 (i) a substantially planar surface; and
 (ii) a character formed in a recessed surface in the
 frame body, and wherein the character comprises an
 upper surface; and
- (b) adhering a contrast layer comprising an adhesive
 substance and a coloring agent having a second color to
 the substantially planar surface of the frame body and
 to the upper surface of the character but not to the
 recessed surface, wherein the second color contrasts
 with the first color.

7. The method of claim 6, wherein the recessed surface
 joins the substantially planar surface of the frame body at a
 substantially non-radiused edge.

8. A method of forming a vehicle license plate frame,
 comprising the steps of:

- (a) forming a frame body having a first color, wherein the
 frame body comprises:
 (i) a substantially planar surface; and
 (ii) a character formed in a recessed surface in the
 frame body, wherein the character comprises an
 upper surface; and
- (b) adhering a contrast layer comprising an adhesive
 substance and a coloring agent having a second color to
 the substantially planar surface of the frame body and
 to the upper surface of the character but not to the
 recessed surface, wherein the second color contrasts
 with the first color, by:
 (i) providing a hot stamp foil having a transfer surface
 and a working surface, the transfer surface compris-
 ing a layer of colored material;
- (ii) placing the transfer surface of the hot stamp foil
 onto the substantially planar surface; and
- (iii) applying heat and pressure to the working surface
 of the hot stamp foil, thereby forming the layer of
 colored material on the substantially planar surface
 of the frame body.

* * * * *

Name & Address:
 Jeffrey G. Sheldon (State Bar No. 67516)
 William D. Bowen (State Bar No. 254398)
 Laura M. Lloyd (State Bar No. 242224)
 SHELDON MAK & ANDERSON PC
 100 E. Corson Street, 3rd Fl. Pasadena, CA 91103

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

EDCO PLASTICS, INC., a California corporation PLAINTIFF(S)	CASE NUMBER SACV 12 - 01316 DOC (RNBx)
v. EPROMOLOGO, a Florida Corporation; INNOVATIVE MARKETING SOLUTIONS, LLC d/b/a/ EPROMO PRODUCTS, a Florida Limited Liability Company; and DOES 1-10, inclusive, DEFENDANT(S).	SUMMONS

TO: DEFENDANT(S): EPROMOLOGO, a Florida Corporation; INNOVATIVE MARKETING SOLUTIONS, LLC d/b/a EPROMO PRODUCTS, a Florida Limited Liability Company; and DOES 1-10, inclusive,
 A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached complaint _____ amended complaint counterclaim cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Laura M. Lloyd, whose address is 100 Corson St, 3rd Floor, Los Angeles, CA 91103. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: 8/15/12

By: DENISE V
 Deputy Clerk

(Seal of the Court)



[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge David O. Carter and the assigned discovery Magistrate Judge is Robert N. Block.

The case number on all documents filed with the Court should read as follows:

SACV12- 1316 DOC (RNBx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

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NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

Western Division
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

Southern Division
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

Eastern Division
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/> EDCO PLASTICS, INC., a California Corporation	DEFENDANTS EPROMOLOGO, a Florida Corporation; INNOVATIVE MARKETING SOLUTIONS, LLC d/b/a EPROMO PRODUCTS, a Florida Limited Liability Company; and DOES 1-10, inclusive
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Jeffrey G. Sheldon, Laura M. Lloyd and William D. Bowen SHELDON MAK & ANDERSON 100 Corson St., 3rd Floor, Pasadena, CA 91103 626.796.4000	Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="width:30%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:40%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td align="center"><input type="checkbox"/> 1</td> <td align="center"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td align="center"><input type="checkbox"/> 4</td> <td align="center"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td align="center"><input type="checkbox"/> 2</td> <td align="center"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td align="center"><input type="checkbox"/> 5</td> <td align="center"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td align="center"><input type="checkbox"/> 3</td> <td align="center"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td align="center"><input type="checkbox"/> 6</td> <td align="center"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. ORIGIN (Place an X in one box only.)

1 Original Proceeding
 2 Removed from State Court
 3 Remanded from Appellate Court
 4 Reinstated or Reopened
 5 Transferred from another district (specify):
 6 Multi-District Litigation
 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: Yes No
 MONEY DEMANDED IN COMPLAINT: \$ TBD

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

Title 15, Patent Infringement

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE / PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input checked="" type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSJ (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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FOR OFFICE USE ONLY: Case Number: SACV 12 - 01316 DOC (RNBx)

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? No Yes
If yes, list case number(s): _____

VII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? No Yes
If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) A. Arise from the same or closely related transactions, happenings, or events; or
 B. Call for determination of the same or substantially related or similar questions of law and fact; or
 C. For other reasons would entail substantial duplication of labor if heard by different judges; or
 D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.
 Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
County of Orange, California	

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.
 Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	County of Orange, Florida

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
County of Orange, California	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER):  Date August 14, 2012

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended, plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))